

cants submit herewith a Declaration under 37 C.F.R. § 1.131. The Declaration establishes, with corroborating documents, that the presently claimed invention was made before August 19, 1999.

5 In view of the above arguments and evidence, applicants respectfully request the Examiner's reconsideration and requests withdrawal of the presently pending § 102(e) rejection.

Claims 17, 21-27, 32, 50-55, and 57 stand rejected under 35 U.S.C. 103(a) as
10 being unpatentable over Kurabayashi et al. (U.S. 5,700,314) or Takahashi et al. (U.S. 5,624,484), either of which in view of Watanabe et al. (U.S. 6,080,229) and either Zhu (U.S. 5,889,083) or EP 735120. Claims 30 and 56 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kurabayashi et al. or Takahashi et al. either of which in view of Watanabe et al. and either Zhu or EP 735120 as
15 applied to claims 17, 21-27, 32, 50-55, and 57 above, and further in view of Yatake (U.S. 6,004,389).

The presently claimed invention is not suggested nor made obvious by a combination of Kurabayashi or Takahashi with Watanabe and either Zhu or EP 735120.
20 There would be no motivation to combine Kurabayashi or Takahashi with Watanabe or even Watanabe and Yatake, because both Kurabayashi and Takahashi disclose quaternary ammonium salts in an underprinted cationic fixer used with an aqueous anionic ink. Watanabe discloses polyvalent metal salts in an underprinted cationic fixer with an aqueous anionic ink. Yatake discloses polyethyleneimine in an underprinted fixer fluid with aqueous anionic ink. There would be no
25 motivation to combine the quaternary ammonium with polyvalent cationic metal, or the quaternary ammonium with polyvalent cationic metal and polyethyleneimine, since there is nothing in any of the cited patents that suggests the desirability of such a combination. Further, there would be nothing desirable about combining
30 quaternary ammonium, polyvalent cationic metal and polyethyleneimine.

By the same token, there would be no motivation to combine Kurabayashi or Takahashi with Zhu or EP 735120. Zhu and EP 735120 disclose an anionic styrene

maleic anhydride binder in an aqueous ink without an underprinted fixer. The binder in Zhu and EP 735120 acts to help bind the anionic colorant of the ink to the media substrate. There would be no motivation to use an ink with the anionic styrene maleic anhydride binder with an underprinted cationic fixer, such as those disclosed in either Kurabayashi, Takahashi or even Watanabe or Yatake. Since the stated purpose in both Zhu and EP 735120 of the anionic binder is to bind or fix the anionic colorant to the substrate, the combination of anionic binder-containing ink with an underprinted cationic fixer would not be desirable, because there is nothing in any of the cited patents that suggests the desirability of such a combination. The fact that the cations in the underprinted fixer would interfere with the anionic binder molecules binding the anionic colorant to the substrate would even make it undesirable because it would hinder the purpose stated in both Zhu and EP 735120 of using the anionic binder to bind the anionic colorant to the substrate.

In light of the above arguments, applicant respectfully asserts that the 35 U.S.C. 103(a) rejections of claims 17, 21-27, 30, 32, 50-57 should be withdrawn and that the presently claimed invention is patentable over any combination of the cited references.

In view of the above amendments and arguments, applicant respectfully request the Examiner's reconsideration and requests withdrawal of the presently pending §§ 102 and 103 rejections. Applicants assert that the presently claimed invention should be allowed.

A prompt and positive response is respectfully requested.

Respectfully Submitted,

Hewlett-Packard Company
1000 NE Circle Blvd. m/s 422B
Corvallis, OR 97330
Tele (541) 715-0159
Fax (541) 715-8581

Shirley Lee et al.

By W. Bradley Haymond
W. Bradley Haymond
Reg No. 35,186
Attorney for Applicants